

AO 91 (Rev. 11/11) Criminal Complaint

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prohibited by court order.

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

JAN 25 2017

United States of America

v.

Case No.

David J. Bradley, Clerk of Court

F.N.U. L.N.U. aka "CHARLES PELLER"  
aka "MICHAEL KOFFI"

H17-0089M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 07/12/16 - 01/25/17 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC Sec. 1343

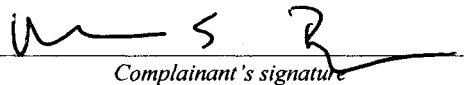
Wire Fraud

18 USC Sec. 1546

Fraud and Misuse of Visas, Permits, and other Documents

This criminal complaint is based on these facts:

See Attached Affidavit of US Postal Inspector Matthew S. Boyden

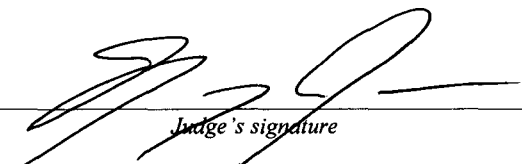
☒ Continued on the attached sheet.

Complainant's signature

US Postal Inspector Matthew S. Boyden

Printed name and title

Sworn to before me and signed in my presence.

Date: 1-25-17City and state: Houston, Texas

Judge's signature

Nancy K. Johnson, US Magistrate Judge

Printed name and title

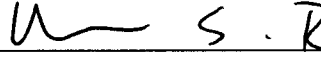
**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

1. Affiant, United States Postal Inspector Matthew S. Boyden, has been employed by the U.S. Postal Inspection Service since January 2000. Affiant is currently assigned to the Major Fraud team in Houston, Texas. Prior to that, Affiant served as a lieutenant of police for a municipal police department in Texas. Affiant has served in the U.S. Air Force as a Law Enforcement Specialist and criminal investigator for the Air Force Office of Special Investigations. Affiant has received specialized training in numerous Postal crimes, but primarily those involving “identity theft” and mail fraud related offenses. Affiant has attended training in the areas of check fraud, credit card fraud, and identity takeover schemes. Affiant has investigated hundreds of cases involving fraud, identity theft, and related “white collar” types of offenses. Affiant is authorized to obtain and execute Federal Arrest and Search Warrants. This Affidavit is made in support of a criminal complaint filed against an unidentified individual using the aliases “CHARLES PELLER” and “MICHAEL KOFFI”.
2. The information set forth in this Affidavit is based upon your Affiant’s personal knowledge and/or information provided to Affiant by other law enforcement agents and officers, witnesses, bank investigators, and cooperating individuals Affiant believes to be reliable and credible. Because this Affidavit is being submitted for the limited purpose of supporting a criminal complaint, Affiant has not included each and every fact concerning this investigation. Affiant has set forth only the facts believed to establish probable cause that an unidentified individual using the aliases “CHARLES PELLER” and “MICHAEL KOFFI” has committed violations of federal law.
3. For the past several months, Affiant has been investigating numerous Business E-mail Compromise (BEC) complaints. The FBI defines BEC fraud as a sophisticated scam targeting businesses that regularly perform wire transfer payments. The scam is carried out by compromising legitimate business e-mail accounts through social engineering or computer intrusion techniques to conduct unauthorized transfers of funds. Most victims report using wire transfers as a common method of transferring funds for business purposes; however, some victims report using checks as a common method of payment. The fraudsters will use the method most commonly associated with their victim’s normal business practices. Affiant has identified numerous bank accounts opened with counterfeit passports in and around

Houston that are being funded with fraudulent BEC wire transfers. All of these wires involve the use of interstate wire communications facilities.

4. On or about July 12, 2016, the unidentified individual rented a private mail box #116 at Gift Mart, 11920 Westheimer #D, Houston, Harris County, Texas 77077. These types of private mail businesses are known as Commercial Mail Receiving Agencies (CMRA), and their mail business is regulated by the US Postal Service. In order for an individual to receive mail at a CMRA, they are required to complete an official US Government form called a PS Form 1583, "Application For Delivery of Mail Through Agent". The form carries warnings and admonishments pertaining to providing false information on the government form with criminal consequences. When the unidentified individual rented the mail box, he used a counterfeit Ghanaian Passport #G1062239 in the name MICHAEL KOFFI. The counterfeit passport contained a photo of the unidentified individual. All of the information listed on the form was bogus. Employees at the CMRA photocopied the passport and provided it to Affiant.
5. Affiant learned that on or about December 16, 2016, the same individual using a different Ghanaian passport G0766463 in the name CHARLES PELLER opened a bank account at Regions Bank in Houston, Texas. The individual used the previously listed address on Westmeimer and provided a phone number of 346-203-6881. On or about December 19, 2016, the account received a \$40,000.00 wire deposit from the USAA Bank account of Robert Trimbl. Mr. Trimbl told bank investigators he sent the money as "taxes on some money he won in Spain". The bank recalled the wire and it was returned to USAA Bank. Affiant learned from SA Katherine Langston with the State Department, Diplomatic Security Service, that both the PELLER and KOFFI passports are fraudulent. Regions Bank employees who met with PELLER stated that the person on the KOFFI passport is the same person as PELLER.
6. Affiant has conducted a review of multiple law enforcement and financial databases and learned that the fraudulent PELLER and KOFFI passports have been used at other financial institutions like Bank of America, Bank of Texas, Chase Bank, Regions Bank, and Wells Fargo Bank to facilitate fraud payments from victims. According to those records over \$500,000.00 has been deposited and withdrawn through these fraud accounts. Affiant has no idea of the true identity of the person using the fraudulent passports to commit fraud.

7. Based upon the above, the undersigned believes there is probable cause to believe that the individual using the passports in the names "CHARLES PELLER" and "MICHAEL KOFFI" has committed crimes in violation of Title 18, United States Code, Sections 1343, and 1546.



Matthew S. Boyden  
United States Postal Inspector

Sworn and Subscribed to me this 25<sup>th</sup> day of January, 2017, and I find probable cause.

  
Nancy K. Johnson

United States Magistrate Judge  
Southern District of Texas